

REMARKS

This application has been carefully reviewed in light of the Office Action dated December 9, 2005. Claims 1 to 8 and 17 to 22 are currently in the application, with claims 1, 2, 6, 17, 19, and 22 being independent claims. Reconsideration and further examination are respectfully requested.

Initially, Applicants thank the Examiner for the courtesies extended to Applicants' undersigned representative during the telephonic interview conducted on January 19, 2006. During the interview, U.S. Patent No. 6,336,174 ("Li") was discussed in view of the current rejection of Claims 1 to 8 and 17 to 22 under 35 U.S.C. § 103(a).

Li is understood to concern a memory module that temporarily transfers data from volatile memory to non-volatile memory in response to a trigger event. As discussed during the interview, however, Li is understood to perform this transfer/store operation only after a trigger event has occurred. See Li, col. 7, ll. 13-15. Accordingly, the operation of transferring/storing data from volatile memory into non-volatile memory is not understood to be a pending operation prior to the occurrence of a trigger event. Rather, these transfer/store operations in Li are understood to be initiated after a trigger event has occurred.

Independent Claims 1, 2, 6, 17, 19 and 22 have been amended to emphasize that the write operations to non-volatile/flash memory are pending prior to detecting power failure or power loss. Accordingly, the claimed invention completes pending write operations in the event of power failure or power loss rather than initiating new operations after power failure or power loss has occurred. Therefore, Claims 1, 2, 6, 17, 19 and 22 are believed to be allowable over Li. Reconsideration and withdrawal of the § 103(a) rejection of Claims 1, 2, 6, 17, 19 and 22 are respectfully requested.

The other claims in the application are dependent from the independent claims discussed above and therefore are believed to be allowable over Li for at least the same reasons. Because each dependent claim is deemed to define an additional aspect of the invention, however, the individual consideration of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, it is believed that the entire application is in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Applicants' undersigned attorney may be reached in our Orange County office by telephone at (949) 851-0633. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

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